

Lewis E. Knapper
January 13, 2009

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION

LEWIS E. KNAPPER AND)
LINDA KNAPPER,)
Plaintiff(s),)
V.) C.A. No. 9:08-CV-84
SAFETY KLEEN SYSTEMS, INC.,)
ET AL,)
Defendant(s).)

ORAL AND VIDEOTAPED DEPOSITION OF
LEWIS KNAPPER
VOLUME 1
JANUARY 13, 2009

ORAL AND VIDEOTAPED DEPOSITION of LEWIS KNAPPER,
VOLUME 1, produced as a witness at the instance of the
Plaintiffs, and duly sworn, was taken in the
above-styled and numbered cause on the 13th of January,
2009, from 9:13 a.m. to 2:34 p.m., before Wendi Broberg,
CSR in and for the State of Texas, reported by machine
shorthand, at the Law Offices of Heard, Robins, Cloud &
Lubel, L.L.P., 3800 Buffalo Speedway, Fifth Floor,
Houston, Texas 77098, pursuant to the Federal Rules of
Civil Procedure.

EXHIBIT

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1 A Yes, sir.

2 Q And during the summer work that you did for
3 your father, how much time do you remember on average
4 that a job would require you to be using Liquid Wrench?

5 A Not all jobs would require it.

6 Q Right.

7 A If we were replacing a sink, you know, I'd have
8 to use it to loosen up bolts underneath the sink or
9 taking apart a water closet, which is a toilet. You'd
10 have to squirt it on the closet bolts to loosen it up.
11 It still would take two or three minutes to squirt it
12 and let it sit there for about five or ten and take it
13 loose. On the average I would say two to three minutes
14 each job.

15 Q Each job?

16 A Each -- each thing that needed to be loosened
17 up.

18 Q And that's what I'm trying to do is trying of
19 get an average to kind of help us out. You said that in
20 a week you would work about 12 hours with your dad?

21 A Uh-huh. Yes, sir.

22 Q And on the average how many times -- how much
23 of that 12 hours would you be spending actually applying
24 Liquid Wrench?

25 A I'd say about ten minutes, to be exact. Let me

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1 explain something, can I do that? Am I allowed to
2 explain?

3 Q Let me ask --

4 A Oh.

5 Q -- you a question.

6 A Yes.

7 Q Stop right there.

8 All right. Explain how you would be
9 applying that ten -- during that ten minutes?

10 A If we had a job to do let's say to replace all
11 the fixtures in the house, the first thing I would do is
12 take Liquid Wrench and squirt it on every fixture, every
13 nut, so when it came time to remove them, they would
14 come off easy. So it would take two to three minutes to
15 squirt it on and then about five minutes, if it wasn't
16 too rusted or real tough, to take them off, take the
17 bolts off.

18 Q And when you are applying the Liquid Wrench,
19 what type of space do you have around you?

20 A If I was replacing a sink, I'd have 36-inches
21 underneath the kitchen cabinet. A lavatory cabinet
22 would be less because they're smaller. A toilet, I'd
23 have the space to the left of the toilet where the water
24 supply came out to squirt it on it.

25 Q When you're underneath the sink, I think you

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1 were making some hand gestures you'd have to squirt it
2 high up.

3 A Uh-huh. I'd be laying on my back, and I'd
4 squirt it up there.

5 Q Okay. And --

6 A To the top of the sink to where the bolts came
7 through to loosen up the rusted bolts.

8 Q And when you would squirt it to remove a
9 fixture, how much do you think Liquid Wrench would you
10 have used?

11 A Half an ounce. It depends on how rusted it
12 was.

13 Q And when you would get under the sink, would
14 there ever be an occasion where you would get dizzy from
15 breathing Liquid Wrench?

16 A Yes, sir.

17 MR. RAMSEY: Objection. Form and leading.

18 MS. LE: Leading.

19 MS. PUJOL: Join. Leading.

20 Q (By Mr. Longoria) And give us a -- and what
21 would you do when that happened?

22 A I'd get fresh air, take my head out from
23 underneath the sink.

24 Q And when you were underneath the sink, tell us
25 how, if at all, any of the Liquid Wrench would get on